

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

GINO MORGAN

Case: 2:20-mj-30262
Assigned To : Unassigned
Assign. Date : 7/23/2020
CMP: USA v MORGAN (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 23, 2020 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922(g)(1)	Possession of a Firearm by a Felon

This criminal complaint is based on these facts:

See attached affidavit

Continued on the attached sheet.



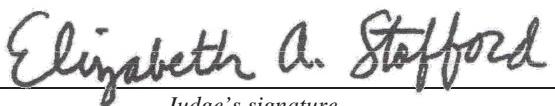
Complainant's signature

Nathan Triezenberg, Special Agent, ATF
Printed name and title

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: 07/23/20

City and state: Detroit, MI



Judge's signature

Hon. Elizabeth A. Stafford, United States Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Special Agent Nathan Triezenberg, being duly sworn, depose and state the following:

1. I make this affidavit from personal knowledge based on my participation in this investigation, including writing and review of reports by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

2. I have been employed with the U.S. Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) since September 2015. I have received formal training through participation and successful completion of the ATF Special Agent Basic Training as well as training at the Federal Law Enforcement Training Center's Criminal Investigator Training Program.

3. This affidavit is in support of a criminal complaint charging Gino MORGAN with a violation of Title 18 U.S.C. Section 922(g)(1)- Possession of a Firearm by a Felon.

4. On July 23, 2020, at approximately 11:00AM, law enforcement officers with the Bureau of Alcohol, Tobacco, Firearms and Explosives executed a Federal

Search Warrant at 42593 Argyle Court, Canton, MI. Upon execution, Gino MORGAN was found in the apartment with his girlfriend.

5. During the search of the residence, ATF personnel recovered a loaded Interarms (Model: Hellup; S/N PAC1129790) handgun. The Interarms firearm was recovered in the dining area of the apartment, located in plain view on a shelf.

6. During the search of the residence, law enforcement also stopped a Dodge Ram (License Plate EDA6060) which was identified as the vehicle primarily used by MORGAN. Someone other than MORGAN was operating the Ram at the time of the stop. Agents executed a search warrant on the Ram and seized an FN (model: Five-Seven; S/N 386216245) handgun from an air vent immediately adjacent to the steering wheel of the vehicle.

7. During a previous review of MORGAN'S social media account, “BIG__RIZZ”, conducted on January 14, 2020, at approximately 0200, MORGAN posted a story containing an image of an FN Pistol with a loaded magazine with ammunition consistent with that of an FN Five-Seven pistol.

8. During a previous review of MORGAN’s social media account, “BIG__RIZZ,” conducted on March 2, 2020, MORGAN is identified in possession of a loaded magazine matching the magazine and ammunition recovered by ATF personnel.

9. During the course of a recorded post-Miranda interview, MORGAN verbally acknowledged his status as a felon and his prohibited status. MORGAN also said, "I see your mans got my FN bro, I already seen he got the gun out of the car."

10. I have reviewed records from the Michigan Department of Corrections and Morgan's criminal history and, based on those records, have learned that he is prohibited from possessing a firearm because he was convicted in 2011 of Larceny from a Motor Vehicle, which is a felony offense punishable by more than a year in prison.

11. The firearms described above were examined by SA Shannon Richardson, who is trained and is recognized as an authority on interstate nexus. It was found that the firearms were manufactured outside of the state of Michigan.

12. Based on the aforementioned facts, I have probable cause to believe that on July 23, 2020 in the Eastern District of Michigan, Gino MORGAN did knowingly possess a firearm while being prohibited as a felon.

Respectfully submitted,



Nathan D. Triezenberg
Special Agent
Bureau of Alcohol, Tobacco,
Firearms and Explosives

Sworn to before me and signed in my
presence and/or by reliable electronic means.

Elizabeth A. Stafford
Honorable Elizabeth A. Stafford
United States Magistrate Judge

Dated: July 23, 2020